



Hexion Inc.
6200 Campground Rd
Louisville, KY 40216
hexion.com

June 5, 2020

US EPA – Region IV
APTMD – 12th Floor
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-3104

Re: HON Report October 13, 2019 through April 13, 2020
Hexion Inc.
Plant ID 0028

To Whom It May Concern:

In accordance with 40 CFR Part 63, Subparts A, F, G and H (Hazardous Organic National Emission Standards for Hazardous Air Pollutants (HON)), please find enclosed the HON Report for the period of October 13, 2019 through April 13, 2020.

Based upon information and belief formed after reasonable inquiry, I certify that the statements and information contained in this document are true, accurate and complete.

Should there be any questions regarding this matter or should there be a need for additional information, please feel free to contact Emily Thompson at (502) 449-6223 or Emily.Thompson@hexion.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Brad Giddens', is written over the word 'Sincerely,'.

Brad Giddens
Louisville Site Leader

Enclosed:
40 CFR Part 63 Reporting Periodic Compliance Report

40 CFR Part 63 REPORTING Periodic Compliance Report

Reporting Period Dates: From October 13, 2019 to April 13, 2020

I. Process Vents

Metal Oxide Process

Process Unit Description: Air Oxidation reactor for formaldehyde production by the Metal Oxide Catalyst process
Control Device: Catalytic Oxidizer
Emission Limitations: 98% reduction of TOC or 20 ppm TOC
Total Hours of Operation: 2,620.50 hours

CFR 63.118(f)

63.118 (f)(1) Report daily average values of monitored parameters for all operating days when the daily average values recorded under paragraphs (a) and (b) of this section were outside the ranges established in the Notification of Compliance Status or operating permit

Inlet compliance temperature determined by testing must be ≥ 230 °C while in HCHO mode and ≥ 270.1 °C while in UFC mode. The MO plant did not operate in UFC mode during the reporting period.

The following are days where the average temperature was less than 230 °C:

There were no periods where the inlet compliance temperature was below 230 °C while the MO Plant was in HCHO mode.

63.118(f)(2) For Group 1 points, report of the duration of the periods when monitoring data is not collected for each excursion caused by insufficient monitoring data as defined in 63.152(c)(2)(ii)(A) of this subpart

There were no periods that monitoring data was unavailable during this reporting period.

63.118(f)(3) Report all times and duration of periods when the gas stream is diverted to the atmosphere through a bypass line.

Bypass is not possible during normal operating conditions.

63.148(j)

63.148(j)(1) If leaks were detected on the closed vent system during the inspection pursuant to 63.148(b)(1)(ii), attach the monitoring report containing the information requested in 63.148(i)(4):

No leaks were detected on the closed vent system.

63.148(j)(2) Report the times of the periods recorded when the vent stream is diverted from the control device through a bypass line:

Bypass is not possible during normal operating conditions.

Silver Catalyst Process

Process Unit Description:	Air Oxidation reactor for formaldehyde production by the Silver Catalyst process
Control Device:	Boiler
Emission Limitations:	98% reduction of TOC or 20 ppm TOC
Total Hours of Operation:	3,258.75 hours

40 CFR 63.118(f)

63.118 (f)(1) Report daily average values of monitored parameters for all operating days when the daily average values recorded under paragraphs (a) and (b) of this section were outside the ranges established in the Notification of Compliance Status or operating permit

The process gas is the primary fuel for the boiler. Therefore, temperature monitoring is not required pursuant to 63.114(a)(3).

63.118(f)(2) For Group 1 points, report of the duration of the periods when monitoring data is not collected for each excursion caused by insufficient monitoring data as defined in 63.152(c)(2)(ii)(A) of this subpart.

The process gas is the primary fuel for the boiler. Therefore, temperature monitoring is not required pursuant to 63.114(a)(3).

63.118(f)(3) Report all times and duration of periods when the gas stream is diverted to the atmosphere through a bypass line.

See attached Startup, Shutdown and Malfunction (SSM) Periodic Report Table for the times and periods when the gas stream is diverted to the atmosphere during stack gas boiler downtime. The stack gas is emitted to the atmosphere through a bypass line during periods of startup and shutdown.

40 CFR 63.148 (j)

63.148(j)(1) If leaks were detected on the closed vent system during the inspection pursuant to 63.148(b)(1)(ii), attach the monitoring report containing the information requested in 63.148(i)(4):

No leaks were detected on the vent system during the inspection.

63.148(j)(2) Report the times of the periods recorded when the vent stream is diverted from the control device through a bypass line and pursuant to 63.148(i)(3)(i) whether the flow indicator was operating and whether a diversion was detected at any time during the hour:

Periods when vent stream was diverted are detailed in 63.118(f)(3) above. The flow indicator was operating during these periods with indication of flow.

II. Storage Vessels

Methanol Storage Tanks

Group 1 Tank Identification: Methanol Tanks; V00A-750 M gal & V00B-1.3 MM gal
Control Device: Internal floating roofs with double seals

40 CFR 63.122

63.122(d)(1) Was an annual inspection required during the six month period?

A visual inspection of the floating roofs was performed during this reporting period.

63.122(d)(2) Was an internal tank inspection required or conducted during the period?

An internal tank inspection was conducted during this period on Methanol Tank V00A in October 2019.

Formaldehyde Storage Tanks

Group 1 Tank Identification: V58 and V59 40,000 gallons each
Control (Recovery) Device: Emissions from these tanks hard piped for recovery to the air inlet of the Metal Oxide (MO) Formaldehyde process. In the event the MO process would be shutdown these emissions would be hard-piped for recovery to the Silver Formaldehyde process. A Group 1 Tank Vent Control Log is maintained to demonstrate control method.

40 CFR 63.122

63.122(g)(i) Description of Planned routine maintenance that is anticipated to be performed for the control device during the next 6 months. This description shall include the type of maintenance necessary, planned frequency of maintenance, and the lengths of maintenance periods.

The Silver Plant catalyst was changed during planned outage in May of 2020. Routine preventative maintenance is planned to occur for both the MO and Silver Plants during the planned shutdown in September 2020. This maintenance includes, but is not limited to, annual boiler inspection, annual interlock check, transmitter calibration, annual boiler gas line inspection, oxidizer visual inspection, annual internal inspection with catalyst sampling, and other preventative maintenance.

63.122(g)(ii) Description of planned routine maintenance that was performed for the control device during the previous 6 months. This description shall include the type of maintenance performed and the total number of hours during those 6 months that the control device did not meet the requirements of this subpart, as applicable, due to planned routine maintenance.

MO catalytic oxidizer and the Silver Boiler were inspected and had minor maintenance performed during periods of process down time. This maintenance includes, but was not limited to, annual interlock checks, quarterly transmitter calibrations, quarterly oxidizer preventative

maintenance, and oxidizer visual inspections. The Silver Plant catalyst was changed during planned outage in December of 2019.

III. Transfer Racks

40 CFR 63.130

63.130(f)(3)(i) For Group 2 transfer racks that are limited to transfer of organic HAP's with partial pressures less than 10.3 kilopascals, documentation is required for the organic HAPs's (by compound that are transferred). The rack weighted average partial pressure does not need to be calculated.

All transfer racks are Group 2. The partial pressures of all organic hazardous air pollutants (HAPs) loaded are less than 10.3 kilopascals (77 mm) at the temperature loaded. Records are maintained to this effect.

IV. Process Wastewater

40 CFR 146

There are no Group 1 wastewaters generated in either the MO or Silver Formaldehyde units.

V. Startup, Shutdown and Malfunction (SSM) Periodic Report

40 CFR 63.152(d)(1) Report Startups, shutdowns, and malfunctions required by 63.10(d)(5) of Subpart A.

Startups, shutdowns, and malfunctions were consistent with Startup, Shutdown and Malfunction plans.

See attached Table.

VI. Leak Detection and Repair Records per 40 CFR 63.182

MO Formaldehyde Process

40 CFR 63.182

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60)								
Company:		Compliance Group:						
Reporting Period:		10/13/2019 Through 4/13/2020						
		October	November	December	January	February	March	April
No. Components Monitored		2	2	2	2	2	2	2
No. Components W/Leaks Detected		0	0	0	0	0	0	0
No. Components Not Repaired < 15 Days		0	0	0	0	0	0	0
Dates & Details of Process Unit Shutdowns During Reporting Period								
Month	# of Days	Comments About Outage/Shutdown/Turnaround						
October								
November								
December								
January								
February								
March								
April								

Silver Formaldehyde Process

40 CFR 63.182

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPAH							
Company:	HEXION CHEMICALS			Compliance Group:	SILVER		
Reporting Period:	10/13/2019 Through 4/13/2020						
PUMP	October	November	December	January	February	March	April
No. Components Monitored	9	9	9	9	9	9	9
No. Components W/Leaks Detected	0	0	0	0	0	0	0
No. Components Not Repaired <= 15 Days	0	0	0	0	0	0	0
Dates & Details of Process Unit Shutdowns During Reporting Period							
Month	# of Days	Comments About Outage/Shutdown/Turnaround					
October							
November							
December							
January							
February							
March							
April							

**Startup, Shutdown and Malfunction (SSM) Periodic Report Table for Section V
Silver Plant**

Date	Duration	Event Description
10/29/2019	3.68	Process & Boiler Shutdown/Startup – Planned maintenance outage for firewater main line
11/12/2019	2.74	Process & Boiler Shutdown/Startup – Planned maintenance outage for firewater main line
11/21/2019	3.33	Process & Boiler Shutdown/Startup – Planned maintenance outage to replace Automatic Transfer Switch
12/04/2019	0.27	Bypass - Planned maintenance outage: flame eye cleaning
12/06/2019	5.33	Process & Boiler Shutdown/Startup - Planned maintenance outage and catalyst change
2/15/2020	4.43	Process & Boiler Shutdown/Startup - Planned maintenance outage and catalyst change
3/18/2020	4.16	Process & Boiler Shutdown/Startup – Planned inventory control